

To: Bergman, Ronald[Bergman.Ronald@epa.gov]
From: Minter, Douglas
Sent: Wed 6/12/2013 7:28:07 PM
Subject: RE: Class VI Permit Boilerplate - REVIEW REQUESTED by June 19, 2013

Ron: My mistake. We are expecting their formal Class VI primacy application soon.

I should have said the NDIC is choosing not to “adopt our federal Class VI rule by reference.”

Hope that helps and apologies for the confusion,

Douglas K. Minter

Acting Chief

UIC Unit

USEPA Region 8

(303) 312-6079

From: Bergman, Ronald
Sent: Wednesday, June 12, 2013 1:14 PM
To: Minter, Douglas
Subject: RE: Class VI Permit Boilerplate - REVIEW REQUESTED by June 19, 2013

Thanks Douglas,

Is North Dakota not coming in for Class VI primacy? I’m not sure I understand your last sentence. Do you mean they aren’t adopting by reference?

From: Minter, Douglas
Sent: Wednesday, June 12, 2013 2:41 PM
To: Bergman, Ronald; Cheung, Wendy
Subject: RE: Class VI Permit Boilerplate - REVIEW REQUESTED by June 19, 2013

Thanks Ron.

Wendy: Please consider getting Craig's input on this exercise before you respond to Molly next week with a copy to me. His extensive work in reviewing NDIC's draft Class VI primacy application may help inform this exercise. Even though NDIC is choosing not to adopt our federal Class V rule, their requirements will be as stringent as EPA's.

Douglas K. Minter

Acting Chief

UIC Unit

USEPA Region 8

(303) 312-6079

From: Bergman, Ronald
Sent: Wednesday, June 12, 2013 12:17 PM
To: Minter, Douglas; Mindrup, Mary
Subject: FW: Class VI Permit Boilerplate - REVIEW REQUESTED by June 19, 2013

Hi Mary and Douglas,

I should have sent this to you first, since we are asking for review by your people. We have been asked to develop some consistency for the Class VI permits, so it would help a lot if Wendy and Kurt could provide their thoughts.

Thank you

From: Bayer, MaryRose
Sent: Wednesday, June 12, 2013 2:06 PM
To: Cheung, Wendy; Hildebrandt, Kurt
Cc: Kobelski, Bruce; McDonald, Jeffrey; Bergman, Ronald
Subject: Class VI Permit Boilerplate - REVIEW REQUESTED by June 19, 2013

Wendy and Kurt,

Attached, please find a draft boilerplate Class VI Permit. Because we are working toward national consistency in permitting (in keeping with CCS Task Force Recommendations to President Obama for reducing barriers to CCS deployment and in an effort to support consistent UIC Class VI Program Implementation), we are seeking review from several Regions (concurrent with our review) –particularly given Class VI interest in your Regions.

Review “guidance/suggestions”: We understand that there are many paths/word choices to achieve the same/similar results. As such, it would be great if you could direct your review toward substantive issues, organization, missing items, and varied approaches that have been used in your Region’s permitting actions. Lastly, if wording *is* of significant importance in certain parts of the document, please feel free to recommend alternative language and we will do our best to accommodate it. **Please send comments to me by c.o.b., Wednesday, June 19, 2013.** (Note: if you wish to share this document with others in your Region, please send back one document with consolidated comments from all reviewers.)

A few other questions on which we would appreciate your feedback:

- ☐ ☐ ☐ ☐ ☐ ☐ Does your Region do a Statement of Basis?
- ☐ ☐ ☐ ☐ ☐ ☐ Is it formulaic or does it vary from permit-writer to permit-writer or by well Class?
- ☐ ☐ ☐ ☐ ☐ ☐ Can you send an example(s) of your Statement of Basis?
- ☐ ☐ ☐ ☐ ☐ ☐ If you do not include a statement of basis, do you have some other document that substitutes for or conveys the same information? Could you send that along?
- ☐ ☐ ☐ ☐ ☐ ☐ Do you do project-specific fact sheets? How are they the same or different from the Statement of Basis?

In conclusion, I want to acknowledge Region 5 for their efforts in putting together this draft language. You may have been engaged in a review of a draft permit outline put together during the earlier stages of implementation. While Region 5 used that language, they also drew upon Regional expertise and their experiences with the Class VI permit application review process to inform the attachment.

Your comments and attention to this important issue are much appreciated. If you have any questions, please don't hesitate to contact me.

Regards,

Molly

Mary Rose Bayer
Geologist, UIC GS Team Leader
U.S. Environmental Protection Agency
Office of Ground Water & Drinking Water: Prevention Branch
Phone: (202) 564-1981